

Exhibit 1



Advocates for Workplace Fairness

VIA ONLINE SUBMISSION

California Labor and Workforce Development Agency
Attn: PAGA Administrator

Re: PAGA Notice of California Labor Code Claims against Bloomberg

Dear PAGA Administrator:

Outten & Golden LLP and Shavitz Law Group, P.A. represent Alexandra Marie Wheatley-Diaz, a former exempt-classified Campaign Field Organizer for Mike Bloomberg 2020, Inc. ("Bloomberg"). Ms. Diaz was employed by Bloomberg from approximately January 20, 2020 until approximately March 10, 2020.

As set forth below, Ms. Diaz alleges that Bloomberg failed to pay her and other similarly-situated employees as required by California law. Specifically, Ms. Diaz alleges that Bloomberg misclassified its Campaign Field Organizers and other similarly titled positions (collectively, "FOs") as exempt from overtime and unlawfully failed to pay them overtime compensation for all hours worked over 40 in a workweek and/or over eight hours in a workday in violation of Cal. Labor Code §§ 510, 1194, 1198 and the corresponding Wage Order. Additionally, Ms. Diaz alleges that Bloomberg violated California law by: (1) failing to provide meal and rest breaks in accordance with Cal. Labor Code §§ 218.5, 226.7, 512 and the applicable Wage Order; (2) failing to timely pay wages during employment and upon separation in accordance with Cal. Labor Code §§ 201-204; (3) failing to provide timely, accurate, and itemized wage statements in accordance with Cal. Labor Code §§ 226, 226.3; and (4) failing to provide reimbursement for reasonable and necessary business expenditures, including but not limited to automobile expense reimbursements, pursuant to Cal. Labor Code § 2802 and the corresponding Wage Order.

This letter serves as notice of our intent to seek civil penalties pursuant to the Private Attorneys General Act ("PAGA"), Cal. Lab. Code §§ 2698, *et seq.*, on behalf of Ms. Diaz and similarly-situated FOs who worked for Bloomberg in the State of California at any time since March 31, 2019. Ms. Diaz alleges that Bloomberg violated numerous provisions of the California Labor Code, including, but not limited to: §§ 201-204, 226, 226.7, 510, 512, 1194, 1198, and 2802 and provisions of the applicable Wage Order. Ms. Diaz will seek all applicable civil penalties on behalf of herself and all similarly-situated FOs, including but not limited to penalties pursuant to the aforementioned statutes and California Labor Code §§ 210, 218.5, 226.3, 226.6, 558, and 2699, and the applicable Wage Order.

The facts and claims contained herein are based on the information available at the time of this writing. Ms. Diaz reserves the right to revise and/or add amend this letter.

Based on the foregoing, Ms. Diaz intends to file a civil action to pursue claims against Bloomberg and to seek PAGA remedies for these violations. Ms. Diaz respectfully requests that the Labor & Workforce Development Agency notify her if it intends to investigate the above allegations pursuant to PAGA.

Thank you for your attention to this matter. Please direct all communications and correspondence to our office going forward. If you have any questions, please do not hesitate to contact us at 202-816-7489.

Sincerely,

A handwritten signature in black ink, appearing to read "Sally J. Abrahamson", with a long horizontal flourish extending to the right.

Sally J. Abrahamson

From: noreply@salesforce.com <noreply@salesforce.com> **On Behalf Of** LWDA DO NOT REPLY

Sent: Tuesday, March 31, 2020 12:59 PM

To: Abrahamson, Sally <sabrahamson@outtengolden.com>

Subject: Thank you for submission of your PAGA Case.

3/31/2020

LWDA Case No. LWDA-CM-781059-20

Law Firm : Outten and Golden LLP

Plaintiff Name : Alexandra Marie Wheatley-Diaz

Employer: MIKE BLOOMBERG 2020, INC.

Item submitted: Initial PAGA Notice

Thank you for your submission to the Labor and Workforce Development Agency. Please make a note of the LWDA Case No. above as you may need this number for future reference when filing any subsequent documents for this Case.

If you have questions or concerns regarding this submission or your case, please send an email to pagainfo@dir.ca.gov.

DIR PAGA Unit on behalf of

Labor and Workforce Development Agency

Website: http://labor.ca.gov/Private_Attorneys_General_Act.htm

U.S. Postal Service™ CERTIFIED MAIL® RECEIPT

Domestic Mail Only

For delivery information, visit our website at www.usps.com

NEW YORK, NY 10036

Certified Mail Fee

\$3.55

\$

Extra Services & Fees (check box, add fee as appropriate)

☐ Return Receipt (hardcopy)

\$

\$0.00

☐ Return Receipt (electronic)

\$

\$0.00

☐ Certified Mail Restricted Delivery

\$

\$0.00

☐ Adult Signature Required

\$

\$0.00

☐ Adult Signature Restricted Delivery

\$

\$0.00

Postage

\$0.55

\$

Total Postage and Fees

\$4.10

\$

Sent To

Street and Apt. No., or PO Box No.

City, State, ZIP+4®

PS Form 3800, April 2015 PSN 7530-02-000-9047

See Reverse for Instructions

0295

06

Postmark
Here

04/09/2020

Mike Bloomberg

229 W. 43rd St, Apt 8
New York, NY 10036-5482

7019 1640 0001 8792 5000



FAQs >

Track Another Package +

Tracking Number: 70191640000187925000

Remove X

Your item was delivered to an individual at the address at 11:57 am on May 14, 2020 in NEW YORK, NY 10036.

 **Delivered**

May 14, 2020 at 11:57 am
Delivered, Left with Individual
NEW YORK, NY 10036

Feedback

Text & Email Updates	▼
Tracking History	▼
Product Information	▼

See Less ^

Can't find what you're looking for?

Go to our FAQs section to find answers to your tracking questions.